

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION
IN ADMIRALTY

Carver Stevedoring Services,)	
Inc.,)	
)	
Plaintiff,)	
)	
vs.)	Civil Action 2:20-01344-DCN
)	
M/V NAVIOS CHRISTINE B (IMO No.))	
9496238), her engines, boilers,)	
tackle, appurtenances, etc.,)	
<i>in rem</i> , and <i>Imba</i> maritime,)	
S.A., Coasters Ventures, Ltd.,)	
and Navios Maritime Partners,)	
L.P., <i>in personam</i> ,)	
)	
Defendants.)	
)	
_____)	(NON-JURY)

MOTION FOR ORDER APPOINTING SUBSTITUTE CUSTODIAN and MEMORANDUM

COMES NOW, Carver Stevedoring Services, Inc., Plaintiff in the above action, and, in accordance with Rule C of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions ("Supplemental Admiralty Rules") of the Federal Rules of Civil Procedure, moves this Court for an Order Appointing Substitute Custodian of Defendant vessel in the usual form.

Nature of Action

This is a case of negligence against the Defendant M/V NAVIOS CHRISTINE B (IMO No. 9496238) (hereinafter "Vessel") *in rem*

pursuant to Rule C of the Supplemental Admiralty Rules and against Defendants Imba Maritime, S.A., and Navios Maritime Partners, L.P., *in personam*,

Factual Background

Plaintiff Carver Stevedoring Services, Inc. has brought an *in rem* action under Rule C and prayed for the arrest and attachment of the Vessel. The United States Marshal's Service in the District of South Carolina requires appointment of a Substitute Custodian in a vessel arrest, due to administrative requirements and manpower limitations. George J. McHugh is experienced a well qualified as a Substitute Custodian of vessels (see Attached Affidavit of Substitute Custodian). George J. McHugh has agreed to serve as Substitute Custodian at the usual fee, and under the usual terms.

Argument

George J. McHugh is experienced and well qualified and should be appointed to serve as Substitute Custodian under the usual terms and conditions.

Conclusion

For the above reasons this Court should appoint George J. McHugh as Substitute Custodian of Defendant vessel.

RESPECTFULLY SUBMITTED BY:

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April 7, 2020

Mount Pleasant, South Carolina